

EXHIBIT 1

News-Only Coordination Protocol¹

Issue	Terms
Scope of Coordination / Safety Valve Depositions	<ul style="list-style-type: none"> Absent good cause, no individual is deposed more than once across the Consolidated News Cases, unless designated as a Rule 30(b)(6) witness or an expert who issues reports in multiple cases
Cross-Production	<ul style="list-style-type: none"> Documents and written discovery cross-produced by Defendants across Consolidated News Cases (already ordered by the Court)
Plaintiff Side Allotted Hours	<ul style="list-style-type: none"> 260-hour cap to be shared by the News Plaintiffs Maximum of 175 hours per Defendant Group² Maximum of 50 hours for non-party fact witnesses This cap includes time for third-party depositions and Rule 30(b)(6) depositions
Defendant Side Allotted Hours	<ul style="list-style-type: none"> 250-hour cap to be shared by Defendants across Consolidated News Cases, with a maximum of 200 hours for Plaintiffs' witnesses and 50 hours for non-party fact witnesses. No more than 105 hours from any one Individual News Plaintiff. "Individual News Plaintiff" means The New York Times in the <i>New York Times</i> case, the Center for Investigative Reporting in the <i>CIR</i> case, and the publishers collectively in the <i>Daily News</i> case.
Per-Witness Time Limits (for depositions taken of Defendants' 30(b)(1) witnesses)	<ul style="list-style-type: none"> Time limit of 10 hours per witness (if solely in individual capacity), to be shared by the News Plaintiffs as they see fit
Rule 30(b)(6) notices	<ul style="list-style-type: none"> In addition to the agreed-upon custodial 30(b)(6) deposition of OpenAI, News Plaintiffs will serve one consolidated merits 30(b)(6) notice on OpenAI and one consolidated merits 30(b)(6) notice on Microsoft.³ In addition to the agreed-upon custodial 30(b)(6) depositions of News Plaintiffs, Defendants may serve one consolidated 30(b)(6) notice for each distinct entity among Plaintiffs in the News Cases.
Rule 30(b)(6) time	<ul style="list-style-type: none"> If any Defendant Group designates two or fewer individuals to testify regarding all topics set forth in a Rule 30(b)(6) notice, the News Plaintiffs are entitled to at least 18 hours of testimony from those individuals or individual. News Plaintiffs may take no more than 25 hours of 30(b)(6) deposition testimony from each Defendant Group Defendants may take no more than 25 hours of 30(b)(6) deposition testimony in each of the <i>New York Times</i> and <i>CIR</i> cases, and no more than 38 hours of 30(b)(6) deposition testimony in the <i>Daily News</i> case.
Expert Depositions	<ul style="list-style-type: none"> This agreement does not apply to and shall not limit the number and duration of depositions of experts.

¹ The Consolidated News Cases include: *The New York Times Co. v. Microsoft Corp., et al.*, (S.D.N.Y. No. 1:23-cv-11195) *Daily News, LP, et al. v. Microsoft Corp., et al.*, (S.D.N.Y. No. 1:24-cv-3285), and *Center for Investigative Reporting v. OpenAI, Inc., et al.* (S.D.N.Y. No. 24-cv-4872). Proposal 1A is being made on behalf of the Plaintiffs in the Consolidated News Cases (the "News Plaintiffs").

² The two Defendant Groups are: (1) OpenAI, Inc., OpenAI LP, OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC, (the "OpenAI Defendants"); and (2) Microsoft Corporation. Hours caps for Party witnesses include depositions of Party-Affiliated witnesses, including former officers, directors, and/or employees of a Party.

³ News Plaintiffs reserve the right to seek leave of Court to serve additional 30(b)(6) notices, if appropriate.

	<ul style="list-style-type: none">• The Parties shall endeavor to negotiate in good faith a separate protocol governing expert depositions.
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